

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Robert M. Pickett, Chairman
Stephen McAlpine
Rebecca L. Pauli
Norman Rokeberg
Janis W. Wilson

In the Matter of Tariff Revision Designated as)
TA285-4 Filed by ENSTAR NATURAL GAS)
COMPANY, A DIVISION OF SEMCO) U-16-066
ENERGY, INC.)
_____)

**ENSTAR NATURAL GAS COMPANY'S FIRST SUPPLEMENTAL RESPONSE TO
OFFICE OF THE ATTORNEY GENERAL'S EIGHTH REQUEST FOR DISCOVERY
(AG-ENSTAR-8)**

Pursuant to 3 AAC 48.155 and 3 AAC 48.141-145, ENSTAR Natural Gas Company ("ENSTAR"), by and through counsel, supplements its response to the Eighth Request for Discovery by the Attorney General ("RAPA"), as follows:

PRELIMINARY STATEMENT

As this case proceeds, facts, information, evidence, documents, and other matters may be discovered which are not set forth in these responses, but which may be responsive to these discovery requests. The following responses are complete based on ENSTAR's current knowledge, information, and belief. Furthermore, these responses were prepared based on ENSTAR's good faith interpretation of the discovery requests and are subject to correction for inadvertent errors or omissions, if any.

Date: 6/15/17 Exh # H-74
Regulatory Commission of Alaska
By: B U-16-066
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

GENERAL OBJECTIONS

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2 1. ENSTAR objects to requests for documents relating to confidential settlement
3 negotiations. Any and all answers ENSTAR provides in response to these data requests will be
4 provided subject to, and without waiving, this objection.

5 2. ENSTAR objects to the production of documents, calculations, and analyses that
6 do not exist. A document is not within a party's "possession, custody, or control" if it does not
7 exist.

8 3. ENSTAR objects to each and every data request insofar as they are vague,
9 ambiguous, overly broad, unduly burdensome, or use terms that are subject to multiple
10 interpretations but are not properly defined or explained for purposes of these data requests.
11 Any and all answers ENSTAR provides in response to these data requests will be provided
12 subject to, and without waiving, this objection.
13

14 4. ENSTAR objects to each and every data request insofar as it is not reasonably
15 calculated to lead to the discovery of admissible evidence and is not relevant to the subject
16 matter of this proceeding.

17 5. ENSTAR objects to providing information to the extent such information is
18 already a matter of public record. RAPA is not entitled to require other parties to gather
19 information that is equally available and accessible to it.
20

21 6. ENSTAR objects to each and every data request insofar as it seeks documents or
22 information protected by the attorney-client privilege or the work product privilege. Nothing
23 contained in these responses is intended as, or shall in any way be deemed, a waiver of any
24 such privilege or protection, or any other applicable privilege or doctrine.

1 7. ENSTAR objects to the instructions contained in RAPA's Eighth Discovery
2 Request to ENSTAR Natural Gas Company. In responding to the requests, ENSTAR will
3 abide by the Commission's discovery regulations and where applicable, Alaska Rules of Civil
4 Procedure.

5 8. ENSTAR objects to the requests for identification of answering and hearing
6 witnesses as part of the responses. Witness designation in this matter is not required by the
7 Commission's regulations or the Alaska Rules of Civil Procedure. In accord with Commission
8 regulations, ENSTAR will identify individuals who supplied information for a particular
9 response where appropriate.
10

11 **FIRST SUPPLEMENTAL DISCOVERY RESPONSES**

12 **AG-ENSTAR-8-5(f):** Refer to the list of Homer extension costs, provided during
13 RAPA's on-site review and Bates Stamped ENS03363-ENS03377.

14 (f) State the Homer Extension Surcharge revenues received each month during
15 2016.

16 **Original Response:**

17 (f) Please see the attached file labeled ENS07514.

18 **Supplemental Response:**

19 (f) Please see the file labeled ENS07514 as well as the "Summary" tab on the file
20 labeled ENS08272.
21

22 **Person(s) Supplying Information:** Daniel Dieckgraeff.
23
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25

1 DATED May 31, 2017 at Dallas, Texas.

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CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2017, a true and correct copy of the foregoing document was served via e-mail on the following:

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